

Revised Permit Conditions

Proposed Construction Permit Revision

The proposed conditions or revisions are in Spanish, the expected permit language.

1. Condition No. 5

The following statement must be added at the end of this condition:

"Dentro de 180 días de esta fecha en adelante, Pfizer deberá realizar un muestreo de chimenea según se especifica en la condición número 6 de este permiso. Pfizer deberá obtener primero un permiso de operación para el inicio de sus operaciones, o sea, el inicio de la producción de sus productos usando la nueva planta de utilidades. Esto no incluye pruebas de funcionamiento que necesita hacer la compañía durante la fase de construcción. En tal caso, este permiso de construcción cubre estas actividades."

Reason:

The purpose of this statement is to clarify that it is necessary to obtain an operating permit before conducting stack testing of the unit and to clarify that trouble shutting testing is covered by the construction permit conditions.

2. Condition No. 7

Change the start up duration from *30 minutes to 60 minutes*.

Reason:

The original permit condition was based on a design estimate that would take thirty (30) minutes or less to heat the SCR units to a point where ammonia injection can begin, which is when effective NOx removal starts. In the commissioning process it was experienced that the design estimates were incorrect - it requires slightly more time to heat up the SCR units than estimated. This modification will not affect PPI's ability to meet the construction permit cap of fifty-six (56) ton of NOx.

3. Condition no. 9

The following statement should be added at the end of this condition:

"Durante los primeros 15 minutos de iniciada la operación, en la cual el HRSG no ha llegado a su temperatura por su operación, se permitirá un "bypass" al HSRG y el sistema de CEM. En sustitución, la compañía Pfizer usará el factor de emisión sin control de 705.4 lbs de NOx/1000 gal o el factor que se demuestre en las pruebas de chimenea. Las emisiones calculadas usando el

factor de emisión sin control deberá añadirse a las lecturas del CEM para determinar emisiones totales del sistema de cogeneración."

Reason:

During commissioning, PPI found that exhaust from the engines after a cold startup is not warm enough to introduce the flue gases directly into the Heat Recovery Boiler (HRSG). Introducing an engine exhaust gas with a temperatures of less than the critical temperature (350 °F) causes the HRSG unit to shut down for safety reasons. To avoid HRSG shutdowns, it is necessary to bypass the engines exhaust around the HRSG and CEM for approximately fifteen (15) minutes or less until they reach the critical exhaust temperature. PPI is evaluating several technical options to minimize the bypass duration and to provide a means of monitoring the bypass emissions with the CEM. In the interim, engine NOx emission during any bypass period will be determined using conservative emission factors, i.e., assuming no SCR reduction. These emissions will be added to the CEM reading to fully account for all the NOx emission from the new utility plant.